Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010

Date filed: 02/20/11

Name of company(s) covered by this certification: ATI Applied Technology, LLC

Form 499 Filer ID: N/A

Name of signatory: Lee D Smith

Title of signatory: President

I, Lee D Smith, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission?s CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company?s procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission?s rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed /s/ Lee D Smith

ATI Applied Technology, LLC? dba QuickPhones

## **CPNI Compliance Procedures**

QuickPhones has established and implemented the following internal policies and procedures that ensure compliance with the requirements of Section 222 of the Communications Act of 1934, as amended, and with the Federal Communications Commission?s rules governing Customer Proprietary Network Information (?CPNI?), codified at 47 C.F.R. § 64.2001 et seq. The following operating procedures ensure that QuickPhones is in compliance with the FCC?s CPNI Rules: QuickPhones does not make available to any affiliated or unaffiliated entity information which meets the definition of CPNI set forth at 47 U.S.C. § 222(h)(1), except when required to do so by law.

QuickPhones only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. QuickPhones does not use its customers? CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 et seq. QuickPhones has practices and procedures that govern the disclosure of CPNI:

- a. QuickPhones does not disclose or release CPNI upon a customer?s telephone request.
- b. QuickPhones does not disclose or release CPNI through online access over the Internet. c. QuickPhones does not have any retail locations where a customer can obtain CPNI.
- d. With respect to telephone inquiries by customers concerning specific call-related issues, QuickPhones requires the customer to provide sufficient specific information about the call in question to confirm the customer?s identity.
- e. QuickPhones automatically notifies customers (at the customer?s original telephone number or address on file) in case any changes are made to the customer?s primary account information.
- f. QuickPhones is prepared to notify the required U.S. government agencies in the event of a breach of the CPNI rules and to provide the required notice to affected customers of any such breach. QuickPhones provides training to all relevant employees on the company's practices and procedures that protect CPNI and its misuse.

It is a violation of QuickPhones? policies to disclose CPNI outside of QuickPhones. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including

termination.

Access to CPNI at QuickPhones is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically.

Strict controls are in place involving responses to law enforcement agencies that serve QuickPhones with valid legal demands, such as a court ordered subpoena, for CPNI. QuickPhones will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.